

**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2010-00036  
COMMUNITY ACTION COUNCIL'S SECOND REQUEST FOR INFORMATION**

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**Witness: Michael A. Miller**

1. Does the Company keep records of which and/or how many of its residential accounts are paid late? If not, why not?

**Response:**

The Company believes its response to CAC-1-2 was responsive to this question and renews its objection rendered in CAC-1-2 to this request. In addition, the Company objects to this question on the grounds that KAW does not have a late payment penalty tariff and the information is not relevant to this proceeding. Notwithstanding the objection, the Company's accounts receivable file has the payment date and the billing file has the billing date. ~~The Company would have to perform extensive analysis and merger of both files for each customer, for each month for the five year period.~~ The Company does not currently have a report requested in the format requested and it would be unduly burdensome and costly to pay the programming and labor required to generate such a report. The CAC goes on to ask for this data to be by county, zip code and census track. This additional information would add even more programming and labor costs to generate a report breaking it down in this fashion, although census track is not a field the Company maintains.

For the electronic version of this response, refer to KAW\_R\_CACDR2#1\_052810.pdf.